

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>IN RE:</b>	§	
	§	<b>Chapter 11</b>
<b>FIRED UP, INC.,</b>	§	
	§	<b>CASE NO. 14-10447-TMD</b>
<b>Debtor.</b>	§	
	§	
	§	

**MOTION FOR PRO HAC VICE**

COMES NOW, Bradford J. Sandler ("Applicant") and moves this Court to grant admission to the United States Bankruptcy Court for the Western District of Texas *pro hac vice* as proposed counsel to the Official Committee of Unsecured Creditors in this case, and would respectfully show the Court as follows:

1. Applicant is an attorney and partner of the law firm of Pachulski Stang Ziehl & Jones LLP with an office at:

Bradford J. Sandler  
Pachulski Stang Ziehl & Jones LLP  
919 North Market Street, 17<sup>th</sup> Floor  
Wilmington, DE 19899-8705  
(302) 652-4100 (Telephone)  
(302) 652-4400 (Facsimile)  
[bsandler@pszjlaw.com](mailto:bsandler@pszjlaw.com)

2. Since 1996, Applicant has been and presently is a member of and in good standing with the Bar of the Commonwealth of Pennsylvania. Applicant's bar license number is 77463.

3. Since 1996, Applicant has been and presently is a member of and in good standing with the Bar of the State of New Jersey. Applicant's bar license number is BS1367.

4. Since 2001, Applicant has been and presently is a member of and in good standing with the Bar of the State of Delaware. Applicant's bar license number is 4142.

5. Since 2008, Applicant has been and presently is a member of and in good standing with the Bar of the State of New York. Applicant's bar license number is BS1367.

6. Applicant has been admitted to practice before the following state and federal courts:

<u>Court</u>	<u>Admission Date</u>	<u>Bar Number</u>
Commonwealth of Pennsylvania	1996	77463
State of New Jersey	1996	BS1367
State of Delaware	2001	4142
State of New York	2008	BS1367
U.S. Court of Appeals for the Third Circuit	2002	--

7. Applicant is presently a member in good standing of the bars of the courts listed above, and is not currently suspended or disbarred in any other court.

8. Applicant has never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court.

9. Applicant is eligible to practice in the Bankruptcy Court.

10. Applicant has read and is familiar with the Local Rules of the Western District of Texas Bankruptcy Court and is also subject to all rules of practice of the U.S. District Court for the Western District of Texas and will comply with the standards of practice set out therein.

11. Applicant has not requested admission *pro hac vice* in the Bankruptcy Court for the Western District of Texas in the preceding twelve months.

WHEREFORE, Applicant prays that this Court enter an order permitting the admission of Bradford J. Sandler to the U.S. Bankruptcy Court for the Western District of Texas *pro hac vice* for this case only.

Dated: April 16, 2014

Respectfully submitted,


  
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[SIGNATURE OF APPLICANT]

Bradford J. Sandler  
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**PROPOSED COUNSEL FOR OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS**

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record via the Court's ECF transmission list in this case and the original upon the Clerk of the Court on this 16<sup>th</sup> day of April, 2014.

  
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Bradford J. Sandler